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VIA ECF AND EMAIL
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Honorable Richard J. Sullivan, U.S.D.J.
Southern District of New York
40 Foley Square, Room 2104
New York, New York 10007

***Re: Evan Andrews v. Al Jazeera Media Network (AJMN), et al.
Civil Action No. 16-cv-06414 (RJS)***

Dear Judge Sullivan:

We represent Defendants Al Jazeera Media Network (“AJMN”) and Al Jazeera America, LLC (“AJAM”) in the above-referenced matter.

On October 25, 2016, AJMN filed its Motion to Dismiss the Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) (the “Motion”). In response to the Motion, Plaintiff filed his Second Amended Complaint on November 7, 2016. While the Second Amended Complaint asserts a number of new allegations pertaining to an alleged agency relationship between AJMN and AJAM, these conclusory allegations do not cure any of the jurisdictional deficiencies outlined in the Motion.

AJMN intends to file a renewed Motion to Dismiss Plaintiff’s Second Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and respectfully requests that Your Honor set forth a new briefing schedule. We thank Your Honor for your consideration.

Respectfully Submitted,

DLA Piper LLP (US)

s/ Elena Chkolnikova
Elena Chkolnikova

cc: Tahanie A. Aboushi, Esq. (counsel for plaintiff) (via ECF)
Michael S. Hanan, Esq. (counsel for ISC) (via ECF)